IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF	*	CASE NO. 21-02050-MCF
TOMAS MARTINEZ VAZQUEZ	*	CHAPTER -13
Debtor	*	

MOTION REQUESTING NEW 341 HEARING

TO THE HONORABLE COURT:

COMES NOW DEBTOR through the undersigned attorney and to this Honorable Court respectfully states and prays as follows:

- 1. Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code in which a payment plan has not been confirmed.
- 2. The 341 hearing of creditor is set to be heard on August 11, 2021.
- 3. That day the debtor will not be able to appear at the hearing because due to the passing of tropical disturbance, he will be working as reinforcement to the island of Vieques for approximately 3 weeks and phone coverage might be spotty at best.
- 4. Debtor is requesting that a new 341 Hearing be scheduled by Trustee on the next available calendar.
- 5. With the new hearing unsecured creditors would not be unfavorably treated and if the plan is confirmed would receive more than under a liquidation chapter.

WHEREFORE it is respectfully requested from this Honorable Court to enter an order taking notice of the above stated and Trustee schedule a new 341 Hearing for the next available date.

CERTIFICATE OF SERVICE: CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion has been electronically filed with the Clerk of the Court using the CM/ECF system that will electronically notify the US Trustee Office, Chapter 13 Trustee José R Carrión, and parties in interest that have filed a Notice of Appearance. Non CM/ECF parties in interest will be notified by US Postal Service first class according to the creditor mailing list.

In Cayey, Puerto Rico this August 10, 2021.

/s/Miriam A. Murphy Lightbourn

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